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PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

1285 AVENUE OF THE AMERICAS NEW YORK, NEW YORK 10019-6064

TELEPHONE (212) 373-3000

LLOYD K. GARRISON (1946-1991) RANDOLPH E. PAUL (1946-1956) SIMON H. RIFKIND (1950-1995) LOUIS S. WEISS (1927-1950) JOHN F. WHARTON (1927-1977)

WRITER'S DIRECT DIAL NUMBER

(212) 373-3035

WRITER'S DIRECT FACSIMILE

(212) 492-0035

WRITER'S DIRECT E-MAIL ADDRESS

rtarlowe@paulweiss.com

January 27, 2020

## **MEMO ENDORSED**

**BY EMAIL** 

The Honorable Katherine Polk Failla United States District Judge Southern District of New York 40 Foley Square New York, NY 10007

UNIT 5201, FORTUNE FINANCIAL CENTER 5 DONGSANHUAN ZHONGLU CHAOYANG DISTRICT, BEIJING 100020, CHINA TELEPHONE (86-10) 5828-6300

HONG KONG CLUB BUILDING, 12TH FLOOR
3A CHATER ROAD, CENTRAL
HONG KONG
TELEPHONE (852) 2846-0300

ALDER CASTLE 10 NOBLE STREET LONDON EC2V 7JU, UNITED KINGDOM TELEPHONE (44 20) 7367 1600

FUKOKU SEIMEI BUILDING 2-2 UCHISAIWAICHO 2-CHOME CHIYODA-KU, TOKYO 100-0011, JAPAN TELEPHONE (81-3) 3597-8101

TORONTO-DOMINION CENTRE
77 KING STREET WEST, SUITE 3100
PO. BOX 226
TORONTO, ONTARIO M5K 1J3
TELEPHONE (416) 504-0520

2001 K STREET, NW WASHINGTON, DC 20006-1047 TELEPHONE (202) 223-7300

500 DELAWARE AVENUE, SUITE 200 POST OFFICE BOX 32 WILMINGTON, DE 19899-0032 TELEPHONE (302) 655-4410 MATTHEW W. ABBOTT

DWARD T. ACKERMAN
JACOB A. ADLERSTEIN
JUSTIN ANDERSON
ACAMAT. JARP F. ASHTOR
ROBERT A. ATKINS
DAVID J. BALL
SCOTT A. ATKINS
DAVID J. BALL
SCOTT A. BARSHAY
PAUL M. BASTA MAN
JOSTE BEAUGHMAN
JYNN B. BASTAM
JYNN B. BASTAM
JYNN B. BERNCK
JESTE BEAUGHMAN
JYNN B. BERNCK
DAVID M. BERNCK
JOSTE BERNGON
MITCHELL L. BERG
MARK S. BERSON
MITCHELL L. BERG
MARK S. CAREY
DAVID CARMONA
GEOFFREY R. CHEPIGA
ELLEN N. CHING
WILLIAM A. CLAREMAN
LEWIS R. C. CAPTON
KELLEY A. COPFEY
JAY COHEN
KELLEY A. FINLESTEN
MANDREW J. ERLICH
ROBERTO J. EL ABSTIDE III
ANDREW J. FRINGESAN
ROBERTO FINZI
PETER E. FISCH
HARRISTOPHER D. FREY
MANDREW J. FREY
MANDREW J. FOLEY
MANUEL S. FREY
MANDREW J. FOLEY
MANUEL S. FREY
MA

BRIAN KIM
KYLE J. KIMPLER
ALEXIA D. KORBERG
ALAN W. KORNBERG
DANIEL J. KRAMER
CATTH KUSHNER
GREGORY F. LAUFER
BRIAN C. LAVIN
JOHN E. LANGE
GREGORY F. LAUFER
BRIAN C. LAVIN
JOHN E. LANGE
GREGORY F. LAUFER
BRIAN C. LAVIN
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BRIAN C. LAVIN
JOHN E. LANGE
GREGORY F. LAUFER
BRIAN C. LAVIN
JOHN E. LANGE
GREGORY F. LAUFER
BRIAN C. LAVIN
JOHN MAYO
ELIZABETH R. MCCOLM
JEAN M. MCLOUGHLINA
JUDIE NG SHORTELL\*
CATHERINE NYARADY
JANA B. GONGHEN
JEAN JEAN JEAN
JEAN M. MCLOUGHLINA
KELLEY D. PARKER
LINDSAY B. PARKER
LORIN J. BARKER
LORIN J. REJSNER
LORIN J. REJSNER
LORIN J. REJSNER
LORIN L. REJSNER
JEANNIE S. RHEE\*
WALTER G. RICCIARDI
WALTER G. RICCIARDI
WALTER G. RICCIARDI
WALTER G. MCCIARDI
WALTER JEAN
JUSTIN NOSENBERG
JACQUELINE P. RUBIN
JUSTIN NOSENBERG
JACQUELINE P. RUBIN
JEFFREY D. SAMUELS
KENNETH M. SCHNEIDER
ROBERT B. SCHUMER
JOHN M. SCOTTI
JEFFREY D. SAMUELS
KENNETH M. SCHNEIDER
ROBERT B. SCHUMER
ROBERT B. SCHUMER
JOHN M. SCOTTI
BRETTER JOHN SCHNEIDER
ROBERT B. SCHUMER
JOHN M. SCOTTI
BRETTER JOHN SCHWAY
SCOTTI M. SONTAG
SCHOMBER
JOHN M. SCOTTI
BRETTER JOHN SONTAG

\*NOT ADMITTED TO THE NEW YORK BAR

United States v. Anilesh Ahuja, 18 Cr. 328 (KPF)

Dear Judge Failla:

We write to respectfully request an adjournment of the deadline for the Court's determination of restitution, currently set for February 17, 2020 for Mr. Shor, and February 24, 2020 for Mr. Ahuja, to March 23, 2020 for both defendants, with any response to the government's restitution proposal to be filed by February 28, 2020.

The 90-day deadline under the Mandatory Victims Restitution Act is not jurisdictional and can be extended by order of the Court. *See, e.g., United States* v. *Cardona*, No. 07 Cr. 1162 (JGK), 2010 WL 883003 (S.D.N.Y. Mar. 11, 2010). We expect that the additional time will enable the parties to narrow substantially the issues in dispute, including by allowing for court approval of ongoing liquidation proceedings involving the PPI Funds and certain of its investors.

Mr. Shor and the government consent to this request.

Respectfully submitted,

Richard C. Tarlowe Roberto Finzi

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PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP Honorable Katherine Polk Failla

cc: Counsel of Record

Application GRANTED.

Dated: January 27, 2020

New York, New York

SO ORDERED.

HON. KATHERINE POLK FAILLA UNITED STATES DISTRICT JUDGE

Katherin Palle Fails